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VIA FACSIMILE (212-805-7906)

The Honorable Denny Chin, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1020
New York, New York 10007-1312

RE: Gottlieb Development LLC v. Paramount Pictures Corporation,
Index No. 08 CV 02416 (DC)

Dear Judge Chin:

We have been retained to represent defendant Paramount Pictures Corporation ('Paramount") in the above-captioned action in which the summons and complaint were apparently served on our client on April 11, 2008 at the New York offices of Viacom Inc., which owns Paramount. Accordingly, the current time for our client to file an answer or motion with regard to the summons and complaint herein expires on May 1, 2008. Paramount requires additional time for investigation of the facts and circumstances alleged in the complaint and for preparation of an appropriate response.

On April 28, 2008, I spoke to Gabriel Fischbarg, Esq., attorney for plaintiff, and requested an adjournment of the time to answer or move until May 31, 2008. Mr. Fischbarg agreed to the proposed extension. Yesterday, I received an email from Mr. Fischbarg, which conditioned his consent on the inclusion of "a provision that defendant shall not contest the sufficiency or manner of service of the complaint." Paramount is not prepared at this stage of proceedings to agree to plaintiff's conditions. I therefore responded to Mr. Fischbarg, asking him to withdraw the condition. Mr. Fischbarg refused.

As a result, Paramount has no choice but to request that the Court grant the extension of time to move, answer or otherwise plead with respect to the summons and complaint until May 31, 2008.

Approved.
SO ORDERED.
[signature]
USDJ 5/1/08

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No prior request for the relief sought herein has been previously made.

Respectfully submitted,

Eleanor M. Lackman

cc.: Gabriel Fischbarg, Esq.